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February 16, 1994

Administrative Judge James P. Gleason, Chairman
Administrative Judge G. Paul Bollwerk, III
Administrative Judge Jerry R. Kline
Administrative Judge Thomas D. Murphy
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 40-8027-EA
Sequoyah Fuels Corporation's Report on the Status
of Activities Related to Completion of
Decommissioning of the Sequoyah Facility

Dear Judges Gleason, Bollwerk, Kline and Murphy:

In accordance with the Board's request at the
prehearing conference on January 19, 1994, enclosed is Sequoyah
Fuels Corporation's report on the "Status of Activities Related
to Completion of Decommissioning of the Sequoyah Facility."

Respectfully submitted,

Maurice Axelrad

Maurice Axelrad

/tg

Enclosure: As Stated

cc: Service List

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**STATUS OF ACTIVITIES RELATED TO
COMPLETION OF DECOMMISSIONING
OF THE SEQUOYAH FACILITY**

On February 16, 1993, Sequoyah Fuels Corporation ("SFC") submitted to the Nuclear Regulatory Commission ("NRC") a Preliminary Plan for Completion of Decommissioning ("PPCD") of the Sequoyah facility at Gore, Oklahoma. Attached is Section 9 of the PPCD, which described the Preliminary Schedule for Decommissioning (Attachment 1).

The dispositioning of process materials (Items 2-7 on Figure 9-1 of the PPCD) is proceeding generally in accordance with the schedule in Figure 9-1 of the PPCD, except that SFC did not complete shipment of raffinate sludge to a uranium mill prior to the expiration of its contract with that mill on February 15, 1994. SFC anticipates that another disposition method will be selected by the end of 1994, and that the disposition of the raffinate sludge will not impact the overall decommissioning schedule contained in the PPCD.

The schedule in Figure 9-1 of the PPCD for submittal of a Site Characterization Plan, Results Report and Plan for Completion of Decommissioning has been modified slightly in order to provide milestones for submittals consistent with the schedule specified in a Resource Conservation and Recovery Act Administrative Order on Consent entered into between SFC and the Environmental Protection Agency ("EPA") on August 3, 1993. Attached is a schedule submitted to the NRC on December 30, 1993, showing side-by-side milestones in the schedules for the NRC and for the EPA (Attachment 2). The Draft Site Characterization Plan was submitted to the NRC on January 28, 1994.

9.0 Preliminary Schedule for Decommissioning

9.1 Overall Schedule

The preliminary schedule for decommissioning the SFC facility is shown in Figure 9-1. The schedule shows the interrelationships and estimated time of the major activities of the decommissioning effort. The schedule provides time for preparation of a Site Characterization Plan (SCP), NRC concurrence with the SCP, implementation of the SCP, review of SCP results with the NRC, preparation of a Plan for Completion of Decommissioning (PCD), NRC concurrence with the PCD, and implementation of the PCD. The schedule also reflects time frames for completion of the major characterization, remediation, and decommissioning activities.

The schedule shown in Figure 9-1 shows the decommissioning being completed in five phases. They are: disposition of process materials, site characterization, preparation of the PCD, implementation of the PCD, and final NRC survey. It should be noted that whenever possible, the phases are scheduled in parallel to minimize the total time for completion of decommissioning. The first phase, disposition of process materials, is a group of activities that are significant in scale but, unless delayed significantly, are not critical path activities. These activities are described in more detail in Section 3 above. These activities encompass the removal of bulk quantities of materials from the SFC Facility. As Figure 9-1 reflects, all but one of these activities are in progress.

The site characterization phase sets the stage for the schedule for completion of decommissioning. As described in earlier sections, this phase involves the evaluation and collection of preexisting and new data. This phase begins with preparation of the SCP and culminates with submittal of a final Results Report. The information developed during site characterization will be instrumental in development of the PCD. It is therefore important to ensure that all the data necessary for decommissioning is identified and collected in a timely and appropriate fashion. SFC anticipates that the SCP will identify additional data that will be required to support the decommissioning effort. It is expected that collection of the required information will be a significant task considering the required types of data and sample collection methods. The submission of an initial Results Report will permit reviews by the NRC, EPA and Oklahoma regulatory agencies to begin while the final site characterization data is being collected and the final Results Report prepared. As in the case of all other milestones in Figure 9-1, SFC assumes that the time period allotted for NRC review will be sufficient to permit completion of review by EPA and Oklahoma regulatory agencies.

Some of the work involved in preparing the PCD can begin after the SCP has been submitted and can continue as information is collected and analyses completed. However, development and submittal of the initial PCD will be dependent upon completion of NRC review of the preliminary Results Report, and submittal of the final PCD will be dependent upon completion of NRC review of the final Results Report. The preparation of the PCD is the most sensitive phase of the decommissioning effort. The PCD must take into account both the site characterization results and applicable NRC and non-NRC regulatory requirements; site-specific criteria must be developed; and the design of an onsite disposal cell must be prepared. Regulatory review and approval of the PCD is then required in order to proceed to the implementation phase.

Implementation of the PCD, necessarily, cannot begin until all or part of the plan is approved by NRC. Here the schedule is controlled by the physical requirements associated with remediation of

structures and grounds. In particular, the schedule is constrained by the implementation of requirements for protection of worker and public health and safety, and protection of the environment.

The final phase is the final survey by the NRC and termination of SFC's source materials license. It may be possible for NRC to conduct portions of its final survey in parallel with remedial action activities, as remediation of each site area is completed.

9.2 The Critical Path

Figure 9-1 indicates with shaded bars the activities that are believed to constitute the critical path of the schedule. The first critical path activity is the preparation of the SCP. The actual time required to prepare the SCP will be largely dependent on the time it takes to define and integrate the information needed to address the requirements of NRC, EPA and the Oklahoma regulatory agencies.

NRC review and approval of the SCP also is on the critical path. Site characterization cannot begin until NRC approves the SCP because changes to the SCP might otherwise require successive iterations of site characterization efforts. The preliminary Results Report will be submitted when the accessible portions of the site have been characterized. While NRC is reviewing the preliminary Results Report, SFC will be incorporating the site characterization data into the initial PCD. This effort will involve complex technical analysis and design of the onsite disposal cell. The schedule includes time for preparation of the initial PCD after completion of the preliminary Results Report.

The time needed for regulatory review of the PCD, beginning with the submittal of the initial PCD, is difficult to estimate. SFC has based its estimate on the anticipation that the PCD will present complex information, and that the need for coordination of regulatory agency reviews will have a significant effect. SFC intends to initiate implementation of the PCD after receipt of the required regulatory approvals. However, if SFC receives the necessary regulatory approvals for a part of the PCD that can feasibly be implemented prior to receipt of other approvals, SFC intends to initiate the approved activities without waiting for the approval of the balance of the PCD.

The estimated time to implement the approved PCD assumes that an onsite disposal cell will be constructed and that between two and four million cubic feet of soil will be excavated and placed in the cell. The length of time to construct, fill and close the cell will be affected by the requirements for controls on the activities to protect the health and safety of the workers.

Comparison of EPA and NRC Schedules

| <u>EPA Activity</u> | <u>Duration</u> ¹ | <u>Possible Finish</u> | <u>NRC Activity</u> |
|--|------------------------------|------------------------|---|
| EPA Order signed | 0d | 8/3/93 | |
| SFC Submit Draft RFI Workplan | 180ed | 1/31/94 | Submit Draft SCP to NRC |
| EPA Review and Comment on RFI Workplan | 30ed ² | 3/2/94 | NRC Comment on SCP |
| SFC submit Final RFI Workplan | 30ed | 4/1/94 | |
| EPA Approve Final Workplan | 30ed ² | 5/1/94 | SFC Submit Final SCP |
| SFC Submit Draft RFI Report | 52ew | 5/1/95 | SFC Submit Preliminary Results Report |
| EPA Review RFI report | 30ed ² | 5/31/95 | NRC Review/Comments on Preliminary Results Report |
| SFC Prep & Submit Final RFI Report | 30ed | 6/30/95 | |
| EPA Approve Final RFI Report | 30ed ² | 7/30/95 | |
| Submit Draft CMS Report | 120ed | 11/28/95 | SFC Submit Initial PCD |
| EPA Review Draft CMS Report | 30ed ² | 12/28/95 | |
| Submit Final CMS Report | 60ed | 2/26/96 | |
| EPA Approves Final CMS Report | 30ed ² | 3/27/96 | |
| | | 4/1/96 ³ | Submit Final SCP Results Report to NRC |
| EPA Public Review and Comment | 45ed | 5/11/96 | |
| EPA Selects CM | 30ed ² | 6/12/96 | |
| | 90ed ⁴ | 6/30/96 | NRC Review/Concurs with Final Results Report |
| SFC Submit Draft CM Program Plan (Task XI) | 60ed | 8/11/96 | |
| EPA Review and Comment | 30ed ² | 9/11/96 | |
| SFC Submit Final Program Plan | 30ed | 10/11/96 | |
| EPA Approve Program Plan | 30ed ² | 11/10/96 | |
| | 180ed ⁵ | 12/28/96 | SFC Submit Final PCD for Approval |
| | 100ew ⁶ | 11/30/98 | NRC Review/Approval of PCD |

NOTES:

- ¹The duration column lists "elapsed days" or "elapsed weeks" committed for a particular task. The values in this column are taken from the Administrative Order on Consent unless otherwise noted.
- ²Each review and comment period is SFC's estimate of time required for the regulatory review. The schedule will shorten or lengthen based upon actual times.
- ³ Approximately 60 days after emptying ponds (other than CaF impoundments)
- ⁴ Estimated 90 days after NRC receipt of Final Results Report
- ⁵ 180 days after NRC concurrence with Final Results Report
- ⁶ Estimated about 2 years for completing regulatory review and hearings if requested.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)
)
SEQUOYAH FUELS CORPORATION)
and GENERAL ATOMICS)
)
(Sequoyah Facility))
_____)

Docket No. 40-8027-EA

CERTIFICATE OF SERVICE

I hereby certify that copies of Sequoyah Fuels Corporation's Report on the Status of Activities Related to Completion of Decommissioning of the Sequoyah Facility were served upon the following persons by deposit in the United States mail, first class postage prepaid and properly addressed on the date shown below:

Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Docketing & Service Branch
(Original and two copies)

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Washington, D.C. 20555

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Dated this 16th day of February 1994.

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